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SNACKERS SINCLAIR, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHEIDA HUKMAN,

Plaintiff,

vs.

SNACKERS SINCLAIR, INC.,

Defendant.

CASE NO.

[formerly Eighth Judicial District
Court Clark County, Nevada,
Case No. A-22-862015-C]

NOTICE OF REMOVAL

COMES NOW Defendant, SNACKERS SINCLAIR, INC., by and through its attorneys of record, Thorndal Armstrong, PC, and provide notice of removal of this action to the United States District Court for the District of Nevada pursuant to 28 U.S.C. §1441.

I. INTRODUCTION

Plaintiff SHEIDA HUKMAN has sued the Defendant in Nevada state court presenting a cause of action for alleged wrongful termination. Plaintiff contends that She was terminated from employment Snackers on or about December 21, 2021, in violation of both federal law. More specifically, Plaintiff alleges that she was discriminated by the Defendant based upon her national origin in violation of Title VII of the Civil Rights Act of 1964 (42 U.S.C. §2000e-2a). Defendant thus removes this case based on the existence of federal questions pursuant to 28 U.S.C. §1331.

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II. PROCESS, PLEADINGS, AND ORDERS RECEIVED BY DEFENDANTS

Defendant Snackers Sinclair, Inc. was served with the Complaint on March 15, 2023. On information and belief, Defendant Greg Fisher has not been served with the First Amended Complaint. A true and correct copy of the Complaint is attached hereto as Exhibit “1.”

III. THE COURT HAS JURISDICTION UNDER 28 U.S.C. §1331

This Court has original jurisdiction over this case pursuant to 28 U.S.C. §1331, as Plaintiff’s First Amended Complaint contains claims based in federal law. See, Exhibit “1.”

IV. THIS REMOVAL IS TIMELY.

Defendant Snackers Sinclair, Inc., received the Complaint on March 15, 2023. This Notice is being filed on April 5, 2023, a date less than thirty (30) calendar days after the Complaint was received by the Defendant, and, accordingly, the removal is timely. See, 28 U.S.C. §1446(C)(3).

V. DEFENDANTS HAVE MET ALL OTHER REQUIREMENTS FOR REMOVAL.

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1331. Removal is proper pursuant to 28 U.S.C. §1441.

2. Defendant attach to this notice as Exhibit 1, a true and correct copy of the Complaint.

3. Defendant will promptly file a copy of this Notice of Removal in the Eighth Judicial District Court of the State of Nevada in and for the County of Clark pursuant to 28 U.S.C. §1446(d).

4. Defendant has served this Notice of Removal upon Plaintiff, Sheida Hukman, who is proceeding in proper person.

DATED this 5th day of April 2023.

THORNDAL ARMSTRONG, PC

/s/ *Aileen E. Cohen*

Aileen E. Cohen, Esq.
Nevada Bar No. 5263
1100 East Bridger Avenue
Las Vegas, NV 89101-5315
Attorney for Defendant

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Thorndal Armstrong, PC and that on this date I caused the foregoing NOTICE OF REMOVAL to be served on all parties to this action by:

 X placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Las Vegas, Nevada.

 United States District Court CM/ECF Electronic Filing Process

 hand delivery

 electronic means (fax, electronic mail, etc.)

 Federal Express/UPS or other overnight delivery

Fully addressed as follows:

**Sheida Hukman
1001 E. Sunset Road, Unit 86321
Las Vegas, NV 89193
*Plaintiff in Proper Person***

DATED this 5th day of April, 2023.

/s/ Salli Phillips

An Employee of Thorndal Armstrong, PC